

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SABRENA JOHNSON, §
§
Plaintiff, § Civ. No. 3:17-cv-1554
§ ECF
v. §
§
STONEGATE SENIOR LIVING, LLC, §
and J-S IRVING OPERATIONS, LP, D/B/A §
THE VILLAGES ON MACARTHUR, §
§
Defendants. §

PLAINTIFF JOHNSON'S UNOPPOSED MOTION FOR EXTENSION TO RESPOND TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiff Sabrena Johnson respectfully requests an extension of the deadline to respond to Defendants' Motion for Summary Judgment. Defendants' counsel is unopposed to this Motion. Defendants filed their Motion for Summary Judgment on October 9, 2017. Plaintiff's deadline to respond to Defendants' Motion is currently October 30, 2017. Plaintiff respectfully requests a two-week extension to respond to Defendants' Motion until November 13, 2017, to allow her counsel to make inquiries of her former bankruptcy attorney and the Office of the United States Trustee for the Eastern District of Texas. This communication is necessary for Plaintiff to respond to Defendants' assertion, in their brief in support of their Motion for Summary Judgment, that Plaintiff failed to disclose her claims against Defendants in her bankruptcy proceeding.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that her deadline to respond to Defendants' Motion for Summary Judgment be extended to November 13, 2017.

Respectfully submitted,

/s/ Austin P. Campbell
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served via ECF on October 17, 2017, to counsel for Defendants:

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/s/ Austin P. Campbell
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CERTIFICATE OF CONFERENCE

I certify that counsel for the parties conferred by phone and email on October 17, 2017, and counsel for Defendants indicated they were unopposed to this motion.

/s/ Austin P. Campbell
Austin P. Campbell